



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
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ALAMEDA POINT
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

November 27, 2007

Mr. Thomas L. Macchiarella, Code BPMOW.TLM
Department of the Navy
Base Realignment and Closure Program
Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

REVIEW OF THE DRAFT PROPOSED PLAN FOR INSTALLATION RESTORATION
(IR) SITE 20 (OAKLAND INNER HARBOR), FORMER NAVAL AIR STATION
ALAMEDA, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed document cited above (IR Site 20 Draft Proposed Plan), dated October 2007. IR Site 20 includes a portion of the Oakland Estuary on the southern side of the Oakland Inner Harbor Channel, including the area offshore of Todd Shipyards.

Comments from the DTSC Office of Military Facilities and Office of External Affairs are attached. These comments were previously submitted to you on November 21, 2007, by electronic mail (e-mail). Please incorporate the recommended revisions in the Draft Final Proposed Plan.

If you have any questions, please contact me at (916) 255-6449 or by e-mail at dlofstro@dtsc.ca.gov.

Sincerely,

Dot Lofstrom, P.G.
Project Manager
Office of Military Facilities

Attachments

cc: See next page.

Mr. Thomas L. Macchiarella
November 27, 2007
Page 2

cc: Dr. Peter Russell
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Mr. John West
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
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Dr. Charlie Huang
California Department of Fish and Game
Office of Spill Prevention and Response
1700 K Street, Suite 250
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Mr. Marcus Simpson
Public Participation
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

OFFICE OF MILITARY FACILITIES
COMMENTS ON THE PROPOSED PLAN FOR
INSTALLATION RESTORATION SITE 20,
FORMER NAVAL AIR STATION ALAMEDA
Dated October 2007

General Comment:

Overall, the Proposed Plan is well-written and easily understood. We have only minor comments on the plan.

Specific Comments:

- 1) The location of Site 20 is not readily apparent on Figure 2. Cross-hatching the site might help. It also might help if the red text that defines the site were moved above the site boundaries, rather than below and to the side. Currently, it looks as if Site 20 is the runway area.
- 2) The second paragraph on page 3 defines the effects range-median (ER-M) screening benchmark value used in the ecological risk assessment. Please add additional plain language text that explains the use of the ER-M and how it is protective of ecological receptors. It is also unclear that the ER-M value was used for the ecological risk assessment and that ambient values were used in the human health risk assessment. This distinction needs to be made in both the text and Table 1. This comment is linked with Comment 5, below.
- 3) The paragraph discussed above in Comment 2 refers to ambient values, and then suggests, parenthetically, that the terms ambient and background are interchangeable. Please briefly describe the term ambient without suggesting that it has the same meaning as background.
- 4) The asterisk on the bottom of page 3 is confusing, as is the reference to high molecular weight polycyclic aromatic hydrocarbons (PAHs). The asterisk suggests there is a link between high molecular weight PAHs and a compound that has both ambient and ER-M values. What is the link? Likewise, the Navy should either explain the significance of separating out high molecular weight PAHs, or not mention them at all.
- 5) Table 1 on page 3 suggests that the maximum value of total PAHs exceeds the ambient value by a multiple of three. The Navy might add a column that lists the average concentration of PAHs at the various depths, or, alternatively, split Table 1 into two tables so that it doesn't appear as if the Navy was shopping for the best screening value. This comment is linked with Comment 2, above.

- 6) Table 2 on page 4 has a typographical error ("Preceptors" instead of "receptors.").
- 7) Please add the name and contact information of the Department of Toxic Substances Control (DTSC) public participation specialist to the Site Contacts column, as follows:

Department of Toxic Substances Control
Public Participation Specialist
Marcus Simpson
8800 Cal Center Drive
Sacramento, California 95826
(916) 255-6683

Mr. Simpson's information should follow that of John West,
Project Manager for the San Francisco Bay Water Board.

- 8) Please revise and edit the following definitions in the glossary.
- DTSC. The definition is not quite correct for the California Environmental Protection Agency Department of Toxic Substances Control. The definition should be for DTSC (rather than Cal-EPA) and should be as follows:

A department within the California Environmental Protection Agency charged with overseeing the investigation and clean-up of hazardous waste sites, herein referred to as DTSC.
 - Effects range-median. The definition for effects range-median (ER-M) should be rewritten in plain language. Most of the definitions in the glossary are nicely written in plain language, but this one needs some additional revision before it is readily understood.
 - High Molecular Weight Polycyclic Aromatic Hydrocarbons (HPAH). HPAHs are defined but there is no significance associated with this subdivision from all PAHs. Please provide a brief statement either in the definitions or in the text as to the significance of separating high molecular weight PAHs from the entire body of PAHs.
- 9) Global Comment: Please italicize or bold the words included in the glossary of terms. Office of Military Facilities (OMF) prefers bold over italics, but this is personal preference.



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Arnold Schwarzenegger
Governor

Memorandum

November 19, 2007

Re: Site 20 Proposed Plan Comments

To: Dot Lofstrom, PG
Senior Engineering Geologist
Office of Military Facilities
Sacramento Office

From: Marcus Simpson
Public Participation Specialist
External Affairs
Sacramento Office

The following represent comments regarding the Former Naval Air Station (NAS) Alameda Installation Restoration Site 20 Proposed Plan from the DTSC Public Participation Unit. NAS Alameda is currently known as Alameda Point.

Comment 1, Regarding Site Investigations Data;

On page 2 of the Proposed Plan, the last sentence in the first paragraph under **Site Investigations** explains, "The purpose of the RI sampling was to characterize the sediment quality, identify any area(s) of unacceptable risk, and delineate any area(s) requiring further evaluation". As written, this sentence does not clearly convey the issue of potential contamination.

Recommendation. Please consider re-writing to read, "The purpose of the RI sampling was to characterize the sediment quality, identify the nature and extent of contamination as well as the potential for human and ecological risks, and determine which areas might require further evaluation in a feasibility study of cleanup alternatives."

Comment 2, Regarding the Site Investigation Data Presented in Table 1;

On Page 3 of the proposed Plan, the maximum Surface Sediment Concentration of total polyaromatic hydrocarbons (PAHs) found at Site 20 (9.32 parts per million (ppm)) is more than three times the ambient value (3.06 ppm), but less than the Effects-range Median (ER-M) value (9.60 ppm). As written, it appears that the Navy is using the less conservative ER-M criteria as a benchmark to justify no further action instead of the ambient value.

Recommendation. Please consider splitting Table 2 into two tables to clarify the use of ambient values in the human health risk assessment versus the ER-M values for the ecological risk assessment. Additionally, it might be helpful to have an average concentration column in the tables, instead of just using the maximum value. The text should also provide a more detailed explanation of the ER-M criteria.

Comment 3, Regarding the Human Health Risk Assessment Information (Specifically Exposure Pathways);

The Proposed Plan contains no reference to drinking water as an exposure pathway.

Recommendation. The Navy should explain why drinking water is not an exposure pathway. This should allay any perception of concerns or fears that the local public may have about the possibility of tainted or contaminated drinking water.

Comment 4 Regarding the Ecological Risk Assessment section;

In general, this section is very complex to the layperson's eye, and the Navy should consider simplifying the language, or using a table or graph to convey the information.

In addition, this section is very general in suggesting that fish tissue samples may have been taken ("modeled tissue concentrations and conservative threshold values"), that three types of toxicity tests were done for risk to benthic invertebrates, and that risks to birds were evaluated using "site-specific exposure estimates" but is not clear in explaining the science behind coming to the conclusion that no unacceptable risks to ecological receptors exists. The Navy might consider re-writing the section to clearly explain, in detail, why no unacceptable risk exists for ecological receptors in the Site 20 area.

Finally, while risk to animal life such as fish, birds, and benthic invertebrates has been reviewed, there is no mention of risk to marine mammals, which are common in the San Francisco Bay and were considered in the RI report. The Navy should explain why marine mammals were not evaluated in the risk assessment, as some members of the Bay Area public may have questions related to the issue.

Please contact me at the contact information provided with additional questions, or for further information regarding the comments I have provided. Thank you.



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